

EXHIBIT 9

CONFIDENTIAL DEPOSITION OF KEVIN KONDAS, VOL. I

2

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE CENTRAL DISTRICT OF CALIFORNIA
3
4

5 KEVIN SO,)
6)
7 PLAINTIFF,)
8)
9 VS.) CASE NO. CV
10) 08-3336 DDP (AGRX)
11 LAND BASE, LLC, UNIVEST)
12 FINANCIAL SERVICES, INC.,)
13 BORIS LOPATIN, INDIVIDUALLY)
14 AND D/B/A/ BORIS LOPATIN)
15 ASSOCIATES, CHARLES W.)
16 WOODHEAD, KEVIN R. KONDAS,)
17 KEITH MILLAR, KM &)
18 ASSOCIATES INTERNATIONAL,)
19 LLC, KB&M PROJECTS,)
20 INTERNATIONAL, LLC, CTL)
21 PROJECTS INTERNATIONAL,)
22 LLC, SUILKEE KIM A/K/A)
23 CAMERON S. KIM, LUCY LU)
24 A/K/A LUCY YAN LU A/K/A)
25 YAN LU A/K/A/ YAN LUCY LU,)
 HENRY YANG, MIRA MELTZER,)
 JEFFREY M. MORITZ, AND)
 LAURENCE GERSCHEL A/K/A)
 LAURENT GERSCHEL, AND DOE)
 DEFENDANTS 1-10,)
)
 DEFENDANTS.)
)
)

19
20 (PAGES 1 - 133 AND 170 - 218)
21
22

23 VOLUME I
24
25 DEPOSITION OF KEVIN KONDAS
 MARCH 18, 2010

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1 THEN SOMEBODY SAID, YES, WE'VE GOT SOME BULLION IN
10:58:02 2 ONE FORM OR THE OTHER, WHETHER THEY'RE DORAY STOCK
10:58:05 3 OR WHETHER THEY'RE ALLUVIAL GOLD, WHERE YOU WOULD
10:58:11 4 SELL IT OR HAVE IT REFINED AND THEN MOVE IT ON TO
10:58:14 5 ANOTHER LEVEL.

10:58:14 6 THAT'S -- THAT WAS PRETTY MUCH JUST
10:58:16 7 A NETWORKING.

10:58:16 8 Q. WHEN WAS THE NEXT TIME HAD YOU AN
10:58:18 9 OPPORTUNITY TO DO BUSINESS WITH MS. MELTZER?

10:58:20 10 A. I CAN'T RECALL.

10:58:23 11 Q. K.M. & A. WAS ESTABLISHED IN 1999;
10:58:31 12 CORRECT?

10:58:31 13 A. YES, MA'AM.

10:58:32 14 Q. OKAY. DO YOU KNOW WHO ROBERT
10:58:37 15 MINTON IS?

10:58:38 16 A. YES, I DO.

10:58:39 17 Q. WHO IS HE?

10:58:42 18 A. HE IS ONE OF MY -- WAS ONE OF MY --
10:58:43 19 I GUESS WE'D CALL HIM A PARTNER NOW. HE'S A
10:58:45 20 FRIEND.

21 Q. SO HE'S A BUSINESS PARTNER AND A
22 FRIEND?

23 A. YES.

24 Q. AND WHEN DID YOU FIRST MEET
25 MR. MINTON?

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1 A. PROBABLY IN '93 OR '92, I'M
10:59:02 2 GUESSING. I SHOULDN'T GUESS. I THINK '92 OR '93.
10:59:06 3 Q. AND WHERE DID YOU MEET HIM?
10:59:10 4 A. I BELIEVE IN ENGLAND.
10:59:12 5 Q. WHERE DOES MR. MINTON RESIDE TODAY?
10:59:21 6 A. IN ENGLAND.
10:59:21 7 Q. WHAT PART?
10:59:22 8 A. LICHFIELD.
10:59:24 9 Q. AND WHEN YOU MET HIM IN THE EARLY
10:59:29 10 '90S, WHAT DID YOU UNDERSTAND HIS BACKGROUND WAS?
10:59:32 11 A. HE WAS A COATINGS INSPECTOR FOR THE
10:59:40 12 INTERNATIONAL ATOMIC ENERGY COMMISSION.
10:59:40 13 Q. A WHAT TYPE OF INSPECTOR?
10:59:40 14 A. COATINGS FOR NUCLEAR REACTORS,
10:59:44 15 INTERNATIONAL ATOMIC ENERGY ASSOCIATION.
10:59:47 16 Q. HOW DID IT COME TO BE THAT YOU AND
10:59:52 17 MS. MELTZER AND MR. MINTON ESTABLISHED K.M. & A.
10:59:55 18 IN 1999?
10:59:56 19 A. MR. MINTON AND I WERE FRIENDS. AND
11:00:02 20 IN A MEETING WITH MS. MELTZER, WE THOUGHT WE HAD
21 ENOUGH DIVERSE NATURE IN OUR BACKGROUNDS THAT WE
22 COULD PUT SOMETHING TOGETHER. SO WE FORMED K.M.A.
23 DEPOSITION OFFICER: COULD I ASK
24 YOU TO KEEP YOUR VOICE UP, PLEASE? I'M LOSING YOU
25 A LITTLE BIT. THANK YOU.

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1 THE DEPONENT: WE FORMED K.M. & A.
11:00:19 2 TO TRY TO -- OR K.M.A.I. TO TRY TO PURSUE BUSINESS
11:00:23 3 IN THE AREAS THAT WE THOUGHT WE MIGHT BE ABLE TO
11:00:27 4 SEE SOMETHING THAT WOULD BE WORKABLE FOR BUSINESS.
11:00:29 5 BY MS. BAKER:

11:00:37 6 Q. WHAT WAS YOUR ROLE IN K.M. & A. IN
11:00:40 7 1999?

11:00:40 8 A. WE FORMED THE COMPANY, AND I GUESS
11:00:48 9 I WAS THE MANAGING MEMBER. MY ROLE, I GUESS IS
11:00:52 10 PROBABLY WHAT YOU'RE LOOKING FOR, IS I WAS THE
11:00:55 11 TECHNOLOGIST.

Q. AND WHAT WAS MS. MELTZER'S ROLE?

11:01:00 13 A. WELL, SHE KIND OF GRAVITATED TOWARD
11:01:04 14 THE METAL SIDE OF LIFE AND ALSO INTO REAL ESTATE.

11:01:07 15 Q. WHAT WAS THE FIRST PART? I'M
11:01:08 16 SORRY.

11:01:08 17 A. METAL, BULLION.

Q. SO WHAT WERE HER RESPONSIBILITIES?

11:01:21 19 A. IF THERE WAS A PROJECT THAT WE WERE
11:01:25 20 LOOKING AT OR IT CAME TO VIEW, SHE WOULD BE --
21 SIMPLY REVIEW IT IF IT HAD THOSE AREAS OF INTEREST
22 IN THAT SHE WAS -- HAD A BACKGROUND IN.

23 Q. HOW DID PROJECTS COME TO
24 K.M. & A.?

25 A. THEY CAME IN FROM A VARIETY OF

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1 FAUCET.

11:03:58 2 SO IT DEPENDS ON WHAT QUADRANT OF

11:04:01 3 TECHNOLOGY WE WORKED IN. BUT FOR THE MOST PART,

11:04:03 4 WE WERE BACK AND FORTH IN TECHNOLOGY, HE AND I,

11:04:06 5 AND THEN -- THAT'S ALL THERE IS TO SAY.

11:04:08 6 Q. OKAY. AND BETWEEN 1999 AND THE END

11:04:12 7 OF 2005, THE MEMBERS OF K.M. & A. WERE YOURSELF,

11:04:17 8 MS. MELTZER AND MR. MINTON; CORRECT?

11:04:20 9 A. CORRECT.

11:04:20 10 Q. NOBODY ELSE?

11:04:21 11 A. NOBODY ELSE.

11:04:22 12 Q. DID THE MEMBERSHIP EVER CHANGE

11:04:24 13 DURING THE EXISTENCE OF K.M. & A.?

11:04:26 14 A. NO, MA'AM.

11:04:27 15 Q. AND YOU WERE THE MANAGING MEMBER;

11:04:33 16 CORRECT?

11:04:33 17 A. CORRECT.

11:04:34 18 Q. AND YOU AND MR. MINTON SORT OF

11:04:40 19 TRADED OFF IN TERMS OF EVALUATING TECHNOLOGY

11:04:43 20 ORIENTED PROJECTS THAT CAME TO THE ATTENTION OF

21 K.M. & A.?

22 A. YES, MA'AM.

23 Q. AND MS. MELTZER WAS MORE INVOLVED

24 IN FINDING POTENTIAL INVESTORS OR UTILIZING HER

25 SOCIAL NETWORK? I'M TRYING TO UNDERSTAND HER

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1 Q. DID YOU HAVE ANY REACTION?

11:46:18 2 A. NO.

11:46:24 3 Q. DID YOU THINK THAT K.M. & A. COULD
11:46:26 4 HELP LU WITH FINDING THAT TYPE OF INVESTMENT
11:46:29 5 OPPORTUNITY?

11:46:30 6 A. WELL, THAT WOULD BE ONE THING THAT
11:46:35 7 WE OBVIOUSLY WOULD WANT TO EXPLORE.

11:46:38 8 Q. OKAY. SO MINTON AND MILLAR WERE
11:46:43 9 EXPLORING THE POSSIBILITY OF HELPING LU FIND THIS
11:46:47 10 INVESTMENT OPPORTUNITY IN A BANK IN 2005; CORRECT?

11:46:51 11 MR. THIBODO: OBJECTION; MISSTATES
11:46:52 12 TESTIMONY.

11:46:52 13 BY MS. BAKER:

11:46:53 14 Q. YOU CAN RESPOND.

11:46:54 15 A. THAT'S THE GENERAL ANSWER, YES.

11:46:56 16 Q. DID MINTON AND MILLAR HELP LU
11:47:10 17 LOCATE A POTENTIAL INVESTMENT OPPORTUNITY AS YOU
11:47:12 18 DESCRIBED?

11:47:14 19 MR. THIBODO: OBJECTION; COMPOUND.

11:47:16 20 THE DEponent: I DON'T UNDERSTAND
21 THE WORD "LOCATE."

22 BY MS. BAKER:

23 Q. WHAT DID THEY DO TO HELP MS. LU AS
24 YOU UNDERSTOOD IT IN 2005?

25 MR. THIBODO: OBJECTION; COMPOUND.

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1 (WHEREUPON, A DISCUSSION WAS HELD
11:51:43 2 OFF THE RECORD.)
11:51:43 3 (WHEREUPON, CORPORATE EXHIBIT NUMBER
11:51:43 4 2 WAS MARKED FOR IDENTIFICATION BY
11:51:43 5 THE DEPOSITION OFFICER AND IS ATTACHED
11:52:50 6 HERETO.)
11:52:50 7 THE VIDEOGRAPHER: THE TIME IS NOW
11:52:54 8 11:52, AND WE'RE BACK ON THE RECORD.
11:52:56 9 BY MS. BAKER:
11:52:58 10 Q. DR. KONDAS, YOU'VE BEEN GIVEN AN
11:53:02 11 EXHIBIT THAT'S BEEN LABELED CORPORATE NUMBER 2 IN
11:53:05 12 THIS DEPOSITION.
11:53:14 13 WOULD YOU TAKE A MOMENT AND REVIEW
11:53:17 14 THAT DOCUMENT AND TELL ME IF YOU'VE SEEN IT BEFORE
11:53:20 15 TODAY.
11:53:20 16 (DOCUMENT REVIEWED BY DEONENT.)
11:53:31 17 THE DEONENT: YES, I HAVE SEEN IT
11:53:33 18 BEFORE.
11:53:33 19 BY MS. BAKER:
11:53:33 20 Q. AND WHAT IS THIS DOCUMENT?
21 A. IT'S THE IRREVOCABLE PROJECT
22 FUNDING AGREEMENT.
23 Q. OKAY. WHO ARE THE PARTIES TO THAT
24 AGREEMENT AS YOU UNDERSTAND IT?
25 A. KEVIN SO, LUCY LU AND K.M.A.I. --

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1 K.M. & ASSOCIATES INTERNATIONAL.

11:53:50 2 Q. LOOKING AT THE LAST PAGE ON THAT
11:53:53 3 DOCUMENT, IS THAT YOUR SIGNATURE ON THIS PAGE?

11:53:56 4 A. YES, IT IS.

11:53:57 5 Q. DO YOU KNOW WHO DRAFTED THIS
11:54:00 6 DOCUMENT?

11:54:00 7 A. NO, I DO NOT.

11:54:01 8 Q. DID YOU DRAFT THE DOCUMENT?

11:54:02 9 A. NO, I DID NOT.

11:54:03 10 Q. DID ANYONE AT K.M. & A. DRAFT THE
11:54:08 11 DOCUMENT?

11:54:08 12 A. NO.

11:54:08 13 Q. ISN'T IT TRUE THAT KEITH MILLAR
11:54:14 14 HELPED YOU SECURE THIS AGREEMENT WITH LUCY LU AND
11:54:17 15 KEVIN SO IN 2005?

11:54:18 16 MR. THIBODO: OBJECTION; ASKED AND
11:54:20 17 ANSWERED.

11:54:20 18 BY MS. BAKER:

11:54:20 19 Q. YOU CAN RESPOND.

11:54:21 20 A. YES.

21 Q. "YES"?

22 A. YES. PARDON ME.

23 Q. SO IS IT TRUE, AS YOU UNDERSTOOD
24 IT, THAT KEITH MILLAR WAS ACTING ON BEHALF OF
25 K.M. & A. IN 2005?

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1 A. I'M SORRY. COULD YOU SAY THAT
11:56:51 2 AGAIN?

11:56:51 3 Q. IN 2005, YOU UNDERSTOOD THAT KEITH
11:56:54 4 MILLAR AND ROBERT MINTON INTRODUCED LUCY LU TO
11:56:58 5 BORIS LOPATIN; CORRECT?

11:56:59 6 MR. THIBODO: OBJECTION; MISSTATES
11:57:00 7 THE RECORD, ASKED AND ANSWERED.

11:57:01 8 THE DEONENT: YES.

11:57:01 9 BY MS. BAKER:

11:57:11 10 Q. IN 2005, YOU UNDERSTOOD THAT KEITH
11:57:16 11 MILLAR AND ROBERT MINTON INTRODUCED LUCY LU TO
11:57:23 12 BORIS LOPATIN & ASSOCIATES?

11:57:24 13 MR. THIBODO: OBJECTION; MISSTATES
11:57:26 14 THE RECORD, ASKED AND ANSWERED.

11:57:26 15 BY MS. BAKER:

11:57:27 16 Q. YOU CAN RESPOND.

11:57:28 17 A. I HAVE NO IDEA WHAT MR. LOPATIN'S
11:57:31 18 COMPANY'S AFFILIATIONS WERE.

11:57:39 19 Q. OKAY. CORPORATE 2, WHICH I GAVE TO
11:57:43 20 YOU JUST A MINUTE OR TWO AGO, IS THAT A TRUE AND
21 CORRECT COPY OF THE IRREVOCABLE PROJECT FUNDING
22 AGREEMENT?

23 MR. THIBODO: OBJECT; VAGUE AND
24 AMBIGUOUS AND CALLING FOR LEGAL CONCLUSION.

25 ///

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1 ACCOUNT."

12:04:11 2 Q. OKAY. WHAT DID YOU UNDERSTAND THE
12:04:14 3 PROJECT FUNDING FROM THIS TRANSACTION TO BE IN
12:04:16 4 2005?

12:04:20 5 MR. DONOVAN: OBJECT TO THE FORM.
12:04:22 6 BY MS. BAKER:

12:04:23 7 Q. YOU CAN ANSWER.

12:04:24 8 A. WHEN THE CLIENT WAS INVOLVED IN AN
12:04:26 9 ASSET ENHANCEMENT EFFORT, WHEN THE CLIENT MADE
12:04:29 10 MONEY AND RECEIVED FUNDS, WE WOULD BE PAID FROM
12:04:35 11 THAT.

12:04:38 12 Q. WHAT WAS THIS ASSET ENHANCEMENT
12:04:40 13 PROJECT AS YOU UNDERSTOOD IT IN 2005, DR. KONDAS?

12:04:47 14 A. IT WAS AN EFFORT INVOLVED IN THE
12:04:50 15 BANK, A BANK, THAT WAS ABLE TO ENHANCE ASSETS.

12:05:00 16 Q. IN THE SPRING OF 2005, DOES -- DID
12:05:08 17 BORIS LOPATIN EVER TALK TO YOU ABOUT A TRADER
12:05:13 18 NAMED MICHAEL BROWN?

12:05:14 19 A. NO. I DON'T BELIEVE HE MENTIONED
12:05:19 20 HIS NAME.

21 Q. DID BORIS LOPATIN EVER MENTION TO
22 YOU IN THE SPRING OF 2005 THAT THERE WAS A TRADER
23 WHO HAD A PROJECT THAT MIGHT BE SUITABLE FOR
24 K.M. & A. CLIENTS?

25 A. YES.

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1 Q. WHAT DID HE TELL YOU, BEING
12:05:42 2 K.M. & A.?

12:05:43 3 A. HE SAID THERE WAS AN EFFORT UNDER
12:05:51 4 WAY AND THAT THE CLIENT WOULD HAVE FULL CAPACITY
12:06:01 5 TO DO TOTAL DUE DILIGENCE, SPEAK WITH A REPUTABLE
12:06:09 6 LAW FIRM IN LONDON, BRING THEIR OWN COUNSEL, TALK
12:06:14 7 TO THE BANK, MAKE SURE THEIR MONEY WAS GUARDED,
12:06:22 8 AND THE TRADER WOULD BE IN A POSITION BY WHICH
12:06:31 9 THEY WOULD ATTEMPT TO ENHANCE THE ASSETS.

12:06:35 10 Q. DO YOU KNOW IF MR. MILLAR
12:06:40 11 COMMUNICATED THAT SAME INFORMATION TO LUCY LU IN
12:06:43 12 2005?

12:06:44 13 MR. DONOVAN: OBJECTION; CALLS FOR
12:06:46 14 SPECULATION.

12:06:46 15 MS. BAKER: I ASKED IF HE KNEW.
12:06:47 16 BY MS. BAKER:

12:06:48 17 Q. YOU CAN ANSWER.

12:06:48 18 A. I BELIEVE THE ANSWER IS YES.

12:06:50 19 Q. AND WHAT DO YOU BASE THAT BELIEF
12:06:57 20 ON?

21 A. THAT WHEN LUCY LU WAS IN LONDON,
22 THEY SPENT FOUR DAYS GOING OVER DETAIL TO MAKE
23 SURE THAT HERSELF AND ALL OF HER ASSOCIATES, KEVIN
24 SO, BIRU WANG, RIGHT DOWN THE LINE, KNEW EVERY
25 DETAIL OF EVERY CONTRACT BEFORE THEY DID ANYTHING.

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1 (WHEREUPON, CORPORATE EXHIBIT NUMBER
2 4 WAS MARKED FOR IDENTIFICATION BY
3 THE DEPOSITION OFFICER AND IS ATTACHED
13:22:54 4 HERETO.)

13:22:54 5 (DOCUMENT REVIEWED BY DEPONENT.)

13:22:55 6 BY MS. BAKER:

13:22:56 7 Q. DR. KONDAS, YOU'VE BEEN HANDED THE
13:22:59 8 DOCUMENT THAT HAS BEEN MARKED AS CORPORATE
13:23:00 9 NUMBER 4.

13:23:03 10 CAN YOU TAKE A MOMENT AND LOOK AT
13:23:05 11 THAT DOCUMENT AND TELL ME IF YOU'VE SEEN IT
13:23:07 12 BEFORE?

13:23:37 13 A. I DON'T KNOW IF I'VE SEEN THIS ONE
13:23:40 14 SPECIFICALLY, BUT I'VE SEEN SOMETHING SIMILAR.

13:23:47 15 Q. DID YOU SEE SOMETHING SIMILAR TO
13:23:49 16 THIS IN 2005?

13:23:50 17 A. I CAN'T TELL YOU.

13:23:52 18 Q. IS IT POSSIBLE YOU SAW SOMETHING
13:24:07 19 SIMILAR TO THIS IN 2005?

13:24:09 20 A. IT'S POSSIBLE.

21 Q. DO YOU SEE ON THE FIRST PAGE OF
22 CORPORATE NUMBER 4 IN 1.3 THE REFERENCE TO
23 TRANSACTION CODE 8885276723?

24 A. YES, I DO.

25 Q. DOES THAT TRANSACTION CODE MEAN

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1 SOMETHING TO YOU?

13:24:33 2 A. NOTHING.

13:24:33 3 Q. HAVE YOU EVER SEEN THAT TRANSACTION
13:24:36 4 CODE BEFORE?

13:24:36 5 A. NOT THE WHOLE THING, BUT I GUESS I
13:24:48 6 SHOULD ANSWER NO.

13:24:49 7 Q. HAVE YOU EVER SEEN PART OF THAT
13:24:51 8 TRANSACTION CODE BEFORE?

13:24:54 9 A. YES.

13:24:54 10 Q. AND WHERE HAVE YOU PREVIOUSLY SEEN
13:24:56 11 PART OF THAT TRANSACTION CODE BEFORE?

13:24:57 12 A. ON THE -- ON DOCUMENTATION FROM
13:25:02 13 BORIS LOPATIN.

13:25:03 14 Q. HAS K.M. & A. EVER USED PART OF
13:25:14 15 THAT TRANSACTION CODE ON ANY OF ITS DOCUMENTS?

13:25:17 16 A. I BELIEVE THE CODE WAS USED ON THE
13:25:28 17 INVOICES SENT TO KEVIN SO AND LUCY LU.

13:25:32 18 Q. ANYPLACE ELSE?

13:25:36 19 A. NOT THAT I CAN RECALL RIGHT NOW.

13:25:38 20 Q. BEFORE THE LUNCH BREAK YOU TALKED
21 ABOUT, I BELIEVE, AN ASSET ENHANCEMENT PROJECT.

22 IS THAT ACCURATE?

23 A. YES.

24 Q. DOES CORPORATE 4 REPRESENT THE
25 ASSET ENHANCEMENT PROJECT THAT YOU WERE TALKING

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1 ANSWERED.

2 BY MS. BAKER:

3 Q. OKAY. LOOKING TO THE FIRST PAGE OF
4 CORPORATE NUMBER 1 -- I'M SORRY, CORPORATE 16, DO
5 YOU SEE THE NOTE THAT SAYS:

6 "DR. KONDAS WILL RETURN THE
7 SIGNED I.P.F.A. TO YOU TOMORROW"?

8 A. YES, I SEE IT.

9 Q. OKAY. IS IT FAIR TO SAY THAT KEITH
10 MILLAR FACILITATED THE EXECUTION OF THE I.P.F.A.?

11 MR. THIBODO: OBJECTION; VAGUE AND
12 AMBIGUOUS.

13 BY MS. BAKER:

14 Q. YOU CAN ANSWER.

15 A. YES.

16 Q. IS IT FAIR TO SAY THAT KEITH
17 MILLAR -- STRIKE THAT.

18 MS. BAKER: 16?

19 MS. KIRNEYAVA: NO.

20 MS. BAKER: OH, HANG ON. HANG ON.

21 (WHEREUPON, A DISCUSSION WAS HELD
22 OFF THE RECORD.)

23 MS. BAKER: 16 AND 17.

24 DEPOSITION OFFICER: THIS IS 17 AND
25 18.

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1 BY MS. BAKER:

2 Q. LET'S DO THIS. LOOKING AT
3 CORPORATE 16 AND 17 --

4 A. YES.

5 Q. -- DO YOU SEE THE SECOND PAGE OF
6 BOTH THOSE DOCUMENTS?

7 A. YES.

8 Q. IT SAYS:

9 "KEITH MILLAR ON BEHALF OF
10 K.M. & ASSOCIATES INTERNATIONAL,
11 L.L.C."?

12 A. YES.

13 Q. OKAY. DOESN'T THAT INDICATE TO YOU
14 THAT KEITH MILLAR WAS HAVING CONVERSATIONS WITH
15 LUCY LU ON BEHALF OF K.M. ASSOCIATES
16 INTERNATIONAL, L.L.C.?

17 MR. THIBODO: OBJECTION; LACKS
18 FOUNDATION, ARGUMENTATIVE.

19 BY MS. BAKER:

20 Q. YOU CAN RESPOND.

21 A. NO.

22 Q. WHY NOT?

23 MR. THIBODO: OBJECTION;
24 ARGUMENTATIVE.

25 THE DEPONENT: HE WAS NEVER

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1 AUTHORIZED TO COMMUNICATE ON K.M.A.'S BEHALF.
2 THAT'S WHY I NEVER SAW THESE, WHICH I TESTIFIED TO
3 ALREADY.

4 BY MS. BAKER:

5 Q. BUT YOU DON'T DENY THAT THESE
6 E-MAILS PURPORT TO STATE THAT KEITH MILLAR IS
7 ACTING ON BEHALF OF K.M. & ASSOCIATES
8 INTERNATIONAL, L.L.C.; CORRECT?

9 MR. THIBODO: THE DOCUMENT --
10 OBJECTION; DOCUMENTS SPEAK FOR THEMSELVES, LACKS
11 FOUNDATION.

12 BY MS. BAKER:

13 Q. YOU CAN RESPOND.

14 A. IT SAYS IT'S NOT TRUE.

15 Q. OKAY.

16 A. HE'S A SEPARATE ENTITY.

17 Q. OKAY.

18 MS. BAKER: GOOD TIME NOW.

19 THE VIDEOGRAPHER: THIS MARKS THE
20 END OF VIDEO CASSETTE NUMBER 2 IN TODAY'S
21 VIDEOTAPED DEPOSITION OF K -- CORPORATE ENTITIES
22 K.M. & ASSOCIATES INTERNATIONAL, K.B. & M.
23 PROJECTS INTERNATIONAL, C.T.L. PROJECTS
24 INTERNATIONAL, ALL BEING REPRESENTED TODAY BY
25 DR. KEVIN KONDAS.